

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE:	§	
	§	
HOUSTON REAL ESTATE PROPERTIES,	§	CASE NO. 22-32998
LLC,	§	(Chapter 7)
Debtor.	§	
	§	
JOHN QUINLAN, OMAR KHAWAJA,	§	
AND OSAMA ABDULLATIF,	§	
Plaintiffs,	§	ADVERSARY NO. 23-03141
	§	
v.	§	
	§	
HOUSTON REAL ESTATE PROPERTIES,	§	
LLC, et al.,	§	
Respondents.	§	

**JOHN QUINLAN, OMAR KHAWAJA, AND OSAMA ABDULLATIF’S
SECOND SUPPLEMENTAL COMPLAINT
[Supplements Doc. Nos. 1 & 26]**

Plaintiffs, John Quinlan, Omar Khawaja, and Osama Abdullatif, file this Second Supplemental Complaint¹ against, Jetall Companies, Inc., Arabella PH 3201 LLC, 9201 Memorial Dr. LLC, 2727 Kirby 26L LLC, Dalio Holdings I, LLC, Dalio Holdings II, LLC, Houston Real Estate Properties, LLC [*Debtor*], Shahnaz Choudhri, Ali Choudhri, Shepherd-Huldy Development I, LLC, Shepherd-Huldy Development II, LLC, Galleria Loop Note Holder LLC, Cypress BridgCo, LLC, Magnolia BridgeCo, LLC, and A. Kelly Williams and adding Otisco rdX, LLC.

Additional Parties

¹ Plaintiffs’ Original Complaint [Doc. No. 1] was filed on or about July 31, 2023, and their First Supplemental Complaint [Doc. No. 26] was filed on or about August 30, 2023.

1. Defendant, Otisco rdX, LLC, is a domestic limited liability company, that may be served with process by serving its registered agent, Ian Cain, at its registered place of business, located at 412 W. Polk Street #1, Houston Texas 77019, or wherever he may be found.

Additional Facts

2. In an effort to avoid being held to account financially, Choudhri and or Respondents, including Otisco rdX, LLC, continued to hide assets or place assets beyond the reach of creditors. More specifically, even though Jetall, Choudhri, and HREP, were facing, at least, three substantial judgments, Respondents began encumbering and or transferring their real property assets to preclude creditor *[namely, Plaintiffs]* from collection. Otisco rdX, LLC is yet another entity through which Respondents committed these bad acts.

Causes of Action

Alter Ego.

3. Plaintiffs allege that Otisco rdX, LLC is an alter egos of Respondents. Respondents utilized their corporate fiction for an illegitimate purpose, meaning “actual or constructive fraud, a sham to perpetrate a fraud, or other similar theory.” TEX. BUS. ORG. CODE §§ 21.223(a)-(b). *SSP Partners v. Gladstrong Inv. (USA) Corp.*, 275 S.W.3d 444, 451-52 (Tex. 2007). Plaintiffs aver that various business entities, including Otisco rdX, LLC and Respondents, are alter egos of each other and being used to conceal assets and therefore are all liable for the full judgment amounts in Lawsuit 1, Lawsuit 2, and Lawsuit 3 *[as defined in the Doc. No. 1]*.

Joint Enterprise Liability.

4. Otisco rdX, LLC was engaged in a joint enterprise because it had an understanding or common purpose to be carried out by the enterprise, a community of pecuniary interest in that common purpose and an equal right to direct and control the enterprise. Otisco rdX, LLC also

committed one or more torts against Plaintiffs while acting within the scope of the enterprise. Plaintiffs have been damaged as a result.

Conclusion

Plaintiffs, John Quinlan, Omar Khawaja, and Osama Abdullatif, request that all defendants *[to the extent that any defendant has not already answered or appeared]*, Jetall Companies, Inc., Arabella PH 3201 LLC, 9201 Memorial Dr. LLC, 2727 Kirby 26L LLC, Dalio Holdings I, LLC, Dalio Holdings II, LLC, Houston Real Estate Properties, LLC *[Debtor]*, Shahnaz Choudhri, Ali Choudhri, Shepherd-Huldy Development I, LLC, Shepherd-Huldy Development II, LLC, Galleria Loop Note Holder LLC, Cypress BridgeCo, LLC, Magnolia BridgeCo, LLC, A. Kelly Williams and Otisco rdX, LLC be cited to appear and answer, and that on final trial, Plaintiffs have the following relief against all defendants, jointly and severally:

- a) Judgment against all defendants for actual, economic, and consequential damages in an amount within the jurisdictional limits of the court;
- b) Exemplary damages;
- c) Pre- and post-judgment interest on the damages awarded as provided by law;
- d) Reasonable and necessary attorneys' fees for trial, and if necessary, appeal;
- e) Costs of Court and Suit;
- f) Avoidance of the transfers or obligations to the extent necessary to satisfy Plaintiffs' claims;
- g) An injunction against further disposition by defendants, or a transferee, or both, of the assets transferred or of other property;
- h) A constructive trust be imposed for the assets fraudulently transferred;
- i) After obtaining a judgment against defendants for their violations, Plaintiffs ask that they be authorized to levy execution on the assets found to have been fraudulently transferred or their proceeds as well as any other relief the circumstances may require; and

- j) All other relief, at law or in equity, to which Plaintiffs are or may be justly entitled.

DATED: March 20, 2024

Respectfully submitted,

HOOVER SLOVACEK LLP



By: _____

T. Michael Ballases

State Bar No. 24036179

ballases@hooverslovacek.com

Steve A. Leyh

State Bar No. 12318300

leyh@hooverslovacek.com

Angeline V. Kell

State Bar No. 24040009

kell@hooverslovacek.com

Brice B. Beale

State Bar No. 24031855

beale@hooverslovacek.com

5051 Westheimer, Suite 1200

Houston, Texas 77056

Telephone: (713) 977-8686

Facsimile: (713) 977-5395

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document, *Second Supplemental Complaint* has been served electronically upon each of the parties on the Court's ECF Service List maintained in this case on March 20, 2024, and as evidenced below.

23-03141 Notice will be electronically mailed to:

James Pope
Melissa Hayward
Jennifer MacGeorge
Jetall Companies, Inc., Arabella PH 3201 LLC, 9201 Memorial Dr. LLC, 2727 Kirby 26L LLC, Dalio Holdings I, LLC, Dalio Holdings II, LLC, Houston Real Estate Properties, LLC [Debtor], Shahnaz Choudhri, Ali Choudhri, Shepherd-Huldy Development I, LLC, Shepherd-Huldy Development II, LLC, Galleria Loop Note Holder LLC
2500 W. Loop South, Suite 255
Houston, Texas 77027
jamesp@thepopelawfirm.com
mhayward@haywardfirm.com
jmac@jlm-law.com

Jeannie Lee Anderson
Linebarger Goggan Blair & Sampson LLP
P.O. Box 3064
Houston, Texas 77253-3064
Houston_bankruptcy@lgbs.com

Bennett Greg Fisher
Lewis Brisbois Bisgaard & Smith
24 Greenway Plaza, Suite 1400
Houston, Texas 77046
Bennett.fisher@lewisbrisbois.com

Melissa E. Valdez
Perdue Brandon Felder Collins & Mott
1235 North Loop West, Suite 600
Houston, Texas 77008
mvaldez@pbfcm.com

Jana Smith Whitworth
Office of United States Trustee
515 Rusk Street, Suite 3516
Houston, Texas 77002
Jana.whitworth@usdoj.gov

Timothy L. Wentworth
Randy Williams
Houston Real Estate Properties, LLC
Okin Adams, LLP
1113 Vine St., Suite 240
Houston, Texas 77002
twentworth@okinadams.com

Rodney Lee Drinnon
McCathern Houston
2000 W. Loop South, Suite 1850
Houston, Texas 77027
ndrinnon@mccathernlaw.com

Melissa S. Hayward
Hayward PLLC
1050 N. Central Expwy, Suite 106
Dallas, Texas 75231
mhayward@haywardfirm.com

Ruth A. Van Meter
Hayward PLLC
10501 N. Central Expwy, Suite 106
Dallas, Texas 75231
rvanmeter@haywardfirm.com

Jim Pierce
James Pope
Shahnaz Choudhri
2500 W. Loop South, Suite 255
Houston, Texas 77027
jim@jamespierce.com

Michael J. Durrschmidt
Hirsch & Westheimer, P.C.
1415 Louisiana, 36th Floor
Houston, Texas 77002
mdurrschmidt@hirschwest.com

James Q. Pope
The Pope Law Firm
6161 Savoy, Suite 1125
Houston, Texas 77036
ecf@thepopelawfirm.com

Bobby Debelak
Cypress Bridgeco, LLC and Magnolia Bridgeco, LLC
McDowell Hetherington
1001 Fannin St., Suite 2400
Houston, Texas 77002
bobby.debelak@mhlhp.com

A. Kelly Williams
12140 Wickchester Ln., Suite 100
Houston, Texas 77079
Akw@milestoneVG.com
Kelly.williams@bridgecofinancial.com



T. Michael Ballases